

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-6 are pending in the present application. Claims 1- 6 are amended without the introduction of any new matter.

In the outstanding Office Action, Claims 1, 2, and 5 were rejected under 35 U.S.C. § 102(b) as anticipated by Phillips et al. (U.S. Patent No. 6,459,894; hereinafter “Phillips”); Claims 3 and 4 were rejected under 35 U.S.C. § 103(a) as unpatentable over Phillips in view of Crosbie (U.S. Patent Pub. No. 2002/0085719 A1); and Claim 6 was rejected under 35 U.S.C. § 103(a) as unpatentable over Phillips in view of Bahl et al. (U.S. Patent No. 6,385,454; hereinafter “Bahl”).

Initially, Applicants and Applicants’ representatives gratefully acknowledge the courtesy of a personal interview with Examiner Portis and Supervisory Patent Examiner Gary on October 19, 2005. During the interview, differences between the present invention and references cited in the outstanding Office Action were discussed. Comments discussed during the interview are reiterated below.

Applicants respectfully traverse the rejection of Claims 1, 2, and 5 under 35 U.S.C. § 102(b) as anticipated by Phillips with respect to amended Claim 1.

Amended Claim 1 is directed to a system comprising a mobile terminal, connection servers and control servers. The mobile terminal is configured to transmit its current location and receive streaming content. The connection servers are configured to acquire their own locations and store the streaming content. Finally, the control servers are configured to receive the connection server locations and form a Voronoi diagram. Further, using the Voronoi diagram, the control servers are configured to identify a target geographic region that it likely to contain a future location of the mobile terminal and based on the

identification, send a streaming content to the connection server in the target geographic region, the streaming content selected based on the future time at which the target geographic region is likely to contain the future location of the mobile terminal.

As discussed during the interview, Phillips, Crosbie and Bahl do not teach or suggest using a Voronoi diagram to identify a target geographic region that is likely to contain a future location of the mobile terminal and based on this identification, send a streaming content to the connection server in the target geographic region, the streaming content selected based on the future time at which the target geographic region is likely to contain the future location of the mobile terminal.

Bahl describes predicting a path of a mobile device and using the prediction to manage a bandwidth allocation at base stations and allow sufficient bandwidth to be available in a hand-off. However, Bahl does not describe or suggest using a Voronoi diagram to identify a target geographic region that is likely to contain a future location of the mobile terminal, nor does Bahl suggest sending a streaming content to the connection server in the target geographic region, the streaming content selected based on the future time at which the target geographic region is likely to contain the future location of the mobile terminal.

Thus, Applicants respectfully submit that Bahl does not teach or suggest “content selected based on the future time at which the target geographic region is likely to contain the future location of the mobile terminal,” as recited in amended independent Claim 1.

Accordingly, Applicants respectfully submit independent Claim 1 and claims depending therefrom patently define over Bahl.

Further, Applicants respectfully traverse the rejections of Claims 3, 4, and 6 under 35 U.S.C. § 103(a) as unpatentable over Bahl and Crosbie or Phillips.

Phillips describes a wireless communication system that measures traffic load of fixed communication stations and sends a portable user connected to a station the location and

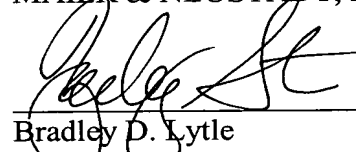
traffic loads of nearby stations.<sup>1</sup> However, Phillips does not describe the claimed features lacking in the disclosure of Bahl noted above. Further, Applicants respectfully submit that Crosbie also does not teach or suggest the features of the claimed invention.

Accordingly, Applicants respectfully submit that independent Claim 1 and claims depending therefrom are allowable.

Consequently, in light of the above discussion and in view of the present amendment, the application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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<sup>1</sup> Phillips, Abstract.